

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-cv-60984-Augustin-Birch**

*[Consent Case]*

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO LLC, and  
MICHAEL SPANOS A/K/A MIKE SPANOS,

Defendants.

/

**JOINT MOTION TO RESET STATUS CONFERENCE**

Plaintiff Melinda Michaels and Defendants Seawater Pro LLC, and Michael Spanos a/k/a Mike Spanos (the “Parties”), by and through undersigned counsel, respectfully request the Court to reset the in-person status conference scheduled for December 1, 2025, at 1:30 p.m., based on the following good cause and availability of their counsel:

1. On November 17, 2025, the Court entered its Paperless Order [ECF No. 90], setting an in-person status conference for December 1, 2025, at 1:30 p.m., and requiring each and every attorney, whether or not an attorney of record, who is advising a party regarding the resolution of this case to appear.

2. The undersigned counsel for the Defendants is unavailable due to a scheduling conflict resulting from his attendance at a one-hour special set hearing in *Mac Bean vs. Abaco International Loss Adjusters, LLC*, Miami-Dade Circuit Court Case No.: 2022-021777-CA-01 (CA 32) on Plaintiff's Motion for Fla. Stat. 57.105 Sanctions Against Defendant and its Counsel, which is scheduled for December 1, 2025, at 1:30 p.m., and for which that court served its Notice of Special Set Hearing on October 30, 2025 (DE 209).
3. The Court further indicated in its Paperless Order that any motion to continue the status conference must include at least three alternative dates on which all counsel are available for a rescheduled in-person status conference. [ECF No. 90]
4. In compliance with the Court's Paperless Order [ECF No. 90], counsel conferred and confirm that all counsel who are required to appear at the in-person status conference are available on the following three dates (and times):
  - a. Thursday, December 4, 2025, at 1:30 p.m. (**preferable for all parties**);
  - b. Wednesday, December 3, 2025, at 1:30 p.m.; or
  - c. Friday, December 12, 2025, anytime.

WHEREFORE, the parties respectfully request that the Court reset the In-Person Status Conference from December 1, 2025, at 1:30 p.m., to Thursday, December 4, 2025, at 1:30 p.m., or on one of the other dates/times set forth above.

Respectfully Submitted,

Dated: November 20, 2025,

/s/ Dillon S. Cuthbertson

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